

Remedial Investigation - Section 5
Resolved Issues

Issue	EPA/LWG Resolution
Global Section 5 Concerns	
<p>1. Consistency with other RI/FS reports: COC list must match BERA/BHHRA list.</p>	<p>a. EPA's Table 5.1-2 was edited to match BRAs. Resolved to clarify nomenclature used to refer to TCDD TEQ (same as dioxin/furan TEQ) and to remove monobutyltin as a "COC".</p> <p>b. Use of term COC, not allowed in RAs – Agreed to delete "COC" from Table 5.1.-2 headers and that the term will not be used in Section 5. Headers will read BERA and BHHRA Screen. The term COC is not used in the text.</p>
<p>2. EPA added source statements in Section 5 which we feel are more appropriate in Section 10 (CSM) along with the summaries of the physical system, upland sources, and loading information from other Sections the RI.</p>	<p>EPA agreed to clarification statements about "sources" throughout Section 5, e.g., modifying the word "source" to clarify that it is "sediment bed source," rather than an upland source.</p>
<p>3. Data Adequacy and Data Quality Statements. RI data set was validated and approved for use by EPA. EPA formally acknowledged adequacy of data set for R/FS at the end of Round 3.</p>	<p>EPA agreed to addition of qualifying statements and elimination of statements that can be interpreted as suggesting that data quality or the amount of data collected is not suitable for completing the RI.</p>
<p>4. Retain Sampling Effort Summaries: Brief summaries of the multi-year sampling approaches provide important context for the reader in Section 5.</p>	<p>EPA agreed to include some additional sampling program details in the data set subsections.</p>
<p>5. Retain project-specific "T", "A" and "V" descriptors in Tables, Maps and Figures. T – The result is mathematically derived, such a summed total. A – Total value is based on a limited number of analytes. V – Median or 95th percentile was obtained through interpolation of data. While not laboratory qualifiers, these are project-specific data descriptors have been used in the database and in numerous Portland Harbor RI technical documents, in addition to the Draft and Draft Final RI reports. Each provides important information about a reported value.</p>	<p>EPA agreed to retain A and T "qualifiers", as long as renamed as "descriptors". V will be deleted.</p>
<p>6. Do not use the term "Key" contaminants (e.g., substitute with "subset of indicator contaminants") for the contaminants presented in the Appendix. In the Draft Final RI, all chemicals presented were labeled indicator contaminants, and subset of the indicator contaminants were presented in the main text.</p>	<p>EPA agreed to remove the term "Key". The 14 contaminants discussed in the main text are called "Indicator Contaminants" and others are simply called "contaminants".</p>

Issue	EPA/LWG Resolution
7. Technical Inaccuracies: There are many statements in EPA's revision that are technically inaccurate and will need to be revised. These include descriptions of the sampling programs, sample counts, fish compositing schemes, etc. We will need to redline EPA's redline and send back once the paths forward on global issues noted above are resolved.	The LWG conducted extensive QA checks on text and data products to correct inaccuracies.
Subsection Specific Issues	
<i>Section 5.2 Bedded Sediment</i>	
1. There is no callout for the revised Box-Whisker plots developed at EPA's request. We asked EPA if these are being presented in Section 5.	Box-whisker plots moved to Section 10.
<i>Section 5.3 Mobile Sediment</i>	
1. Borrow pit data set was not included. Section 5.0 states those data will be included in 5.3 as natural sediment traps. Integral proposed adding that material, formerly in Appendix H, into this subsection.	Borrow pit discussion will be included in Section 6 (Loading, Fate and Transport for Select Contaminants).
<i>Section 5.4 Surface Water</i>	
1. WQC/MCL comparisons We requested clarification regarding the purpose of the MCL/WQ Criteria comparisons. In the Draft RI, comparison of SW and TZW data to human health criteria were presented in Appendix D3.3, as requested by EPA. This sort of evaluation is not performed with respect to other media (expressly not performed for sediments). Comparison to upriver surface water concentrations would be parallel to the approach used in other subsections. In addition, these comparisons are presented under the spatial distribution subheader which is no longer accurately named. The added text is often unclear about which AWQC for human health is being compared to and seems to be inconsistent in the criteria cited. Finally, some individual compound criteria (e.g., BaP) are inappropriately compared to summed totals.	SW data comparisons to Oregon standards and MCLs will be retained. EPA agreed to add the following footnote for the MCL comparisons: "Under Oregon State Administrative Rules, OAR 340-041-0340, Table 340A, the designated beneficial use of the lower Willamette River includes private and public domestic water supply after adequate pretreatment to meet drinking water standards. There are no known current or anticipated future uses of the lower Willamette River within Portland Harbor as a private or public domestic water supply. As such, their use in this section is solely as values for comparison." Also, EPA agreed to delete Appendix D3.3 in its entirety.
2. Source statements are numerous in the Section 5.4. For this medium in particular, such statements seem inappropriate and premature and should be reserved for Section 10 where the various elements on the RI are juxtaposed and discussed.	See Global Item 1 above.
3. Histogram format that was previously agreed to not reflected in these EPA comments; we need confirm that is an oversight not a change in position.	EPA acknowledged this was an oversight not a change in position, so the previous agreement still holds.

Issue	EPA/LWG Resolution
<i>Section 5.5 TZW</i>	
1. Sample count discrepancies appear to be due to an inadvertent omission of certain sample codes in PA's SCRA extract. We can replicate the Appendix D4 counts.	EPA agreed to allow the LWG to correct these kinds of discrepancies during LWG generation of the electronic version, and EPA will verify the corrections at that time.
<i>Section 5.6 Biota</i>	
1. Numerous mis-statements about tissue composition scheme, sampling zones, and whole body vs fillet concentrations need to be corrected.	EPA agreed these are also editorial corrections that should be made without the need for further discussion.